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JUDGE LEISURE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BOARD OF MANAGERS OF THE
195 HUDSON STREET CONDOMINIUM,

X

07 CIV 4058

Plaintiff,

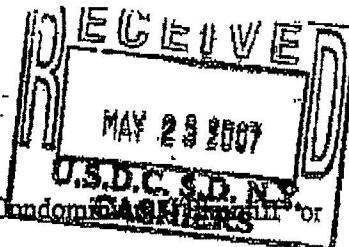
— against —

JEFFREY M. BROWN ASSOCIATES, INC. and
LEXINGTON INSURANCE COMPANY,

Defendants.

COMPLAINT

JURY TRIAL DEMANDED



Plaintiff Board of Managers of the 195 Hudson Street Condominium (hereinafter referred to as the "Board"), by its attorneys Judd Burstein, P.C., complaining of the Defendants, allege as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332, in that this is a civil action between citizens of different States, and the amount in controversy exceeds \$75,000.
2. Venue lies in this District pursuant to 28 U.S.C. § 1331(a)(2).

THE PARTIES

3. Plaintiff Board is the representative of the unit owners of the 195 Hudson Street Condominium. None of the unit owners are citizens of the States of Pennsylvania, Delaware or Massachusetts.

4. On information and belief, Defendant Jeffrey M. Brown Associates, Inc. ("JMB") is a corporation organized under the laws of the State of Pennsylvania and maintains its principal place of business in the State of Pennsylvania.

EXH. 1